## REMARKS

As stated above, Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks. Applicants have carefully reviewed and considered the Official Action mailed on November 22, 2005, and the references cited therein. Reconsideration and allowance of the subject application, as amended, is respectfully requested.

Presently, claims 1-5, 7-19 and 21-30 are pending. Claim 16-18 have been amended; as a result, claims 1-5, 7-19 and 21-30 are now pending in this application.

Regarding item 2 of the subject office action, the Examiner rejects claims 16-18 under 35 USC §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. In particular, the Examiner appears to suggest that the term "the application" in claim 16 lacks antecedent basis. The Examiner suggests that a similar issue is present in claims 17 and 18.

Claims 16, 17 and 18 have been amended to better clarify the Applicants' invention.

Regarding Items 3 and 4 of subject office action, the Examiner rejects claims 1, 2, 12 and 16, under 35 USC §102(e), as being anticipated by Jeong (U.S. Patent No. 6,801,540; hereinafter Jeong).

The Examiner points to Jeong as disclosing a communication system that includes a stimulus agent (FIG. 1, H.323 GATEWAY 21) configured to receive user input (column 4, lines 51-61) requesting an Internet Protocol IP telephony service and communicate the received input (column 4, lines 51-61) over a packet-based network using a standard call control protocol (H.323 protocol, column 4, lines 20-49); a call agent, executing on a remote server (FIG. 1, H.323 GATEKEEPER) connected to the packet-based network, configured to perform the

requested IP telephony service based on the received input (column 4, lines 51-61), wherein the received user input (column 4, lines 51-61) comprise Dual Tone Multi-Frequency DTMF input (column 4, lines 51-61).

Applicants claim (in independent claim 1):

1. A system comprising:

a stimulus client configured to receive user input requesting an Internet Protocol (IP) telephony service and communicate the received input over a packet-based network using a standard call control protocol; and

a call agent, executing on a remote server connected to the packet-based network, configured to perform the requested IP telephony service based on the received input, wherein the received user input comprises Dual Tone Multi-Frequency (DTMF) input.

Applicants claim (in independent claim 12):

12. A client application comprising:

an application layer configured to receive Dual Tone Multi-Frequency (DTMF) input corresponding to a requested Internet Protocol (IP) telephony service; and

a call control protocol stack configured to communicate the received DTMF input to a feature server over a packet-based network using a standard call control protocol.

Claim 1 recites that a stimulus client receives user input requests for IP telephony services and communicates the received input to a remote location for performing the requested services. Claim 12 recites two components that may implement a stimulus client. The stimulus client may be relatively small in size since it performs few functions besides passing user input data. In this regard, the subject application reads:

> "FIG. 3 is a block diagram of an IP telephony network configuration 300 that implements a "stimulus"-based IP telephony client 310, residing on a user's computer platform, in communication with a feature server 304 to provide enhanced IP telephony functionality. As used herein, a stimulus client may be one that provides very little, if any, functionality locally but rather passes through input from a user to a remote server, which in turn provides the requested functionality. The stimulus client may communicate with the server by means of "stimulus

> signaling." Put another way, a stimulus client may be one that acts as a stimulus that causes the server to provide functionality requested by a user at the client. By moving the software infrastructure that provides the bulk of the functionality to the server side, a stimulus client can be made "lightweight"--that is, very small in size--while still providing the user with a rich and robust feature set." (paragraph 0011, emphasis added)

Thus, the stimulus client primarily provides user input to a remote server that performs requested telephony services. This user input may be represented as Dual Tone Multi-Frequency (DTMF) data, which may be sent to the remote server. In this regard, the subject application reads:

> "In a typical application, the stimulus client 310 would receive input from a user through a user interface such as depicted in FIG. 2. For example, if the user entered a telephone number to be dialed by clicking appropriate buttons in the dialpad portion of graphical controls 202, the stimulus client 310 would collect the entered digits and transmit them as DTMF (dual tone multi-frequency) data to the feature server 304, which in turn would establish a connection with the called endpoint. Alternatively, or in addition, a user at the client could request one or more supplementary services by entering appropriate numbers on the dialpad, which would be collected by the client 310 and passed on to the feature server 304, which in turn would provide the requested functionality. A supplementary service is defined as any telephony service over and above basic "plain old telephone service" (POTS), which is limited to making and receiving calls. Examples of supplementary services include call transfer, call forwarding, hold, voice-mail, call-waiting, 3-way conferencing, and the like." (paragraph 0014, emphasis added)

Thus, a stimulus client may provide DTMF data to a remote feature server for executing telephony services.

Turning to the subject action, the Examiner appears to equate the stimulus client with an H.323 gateway that is illustrated in Figure 1 of Jeong. Citing from item 4 of the subject action:

> "Jeong discloses a communication system comprising the following features: regarding claim 1, a stimulus client (FIG. 1, H.323 GATEWAY 21) configured to receive user input (column 4, lines 51-61)."

However, the H.323 gateway is not understood to receive user input for performing telephony services and communicate the user input to a remote server for performing the services. Rather, the reference describes that the H.323 gateway converts Public Switched Telephone Network (PSTN) signals into an International Telecommunications Union (ITU) standard signal (i.e., a H.323 signal) that may be used for videoconferencing over networks. In this regard, the portion of Jeong cited by the Examiner reads:

> In addition, a H.323 gate way 21 which converts a PSTN signal into a H.323 signal and converts on the contrary is comprised in order to make the H.323 terminals 401, 403, . . . and the property terminal 501, 503, 505, . . . connected to local area network communicate to the terminals connected to external PSTN, and an office interface unit 25 which is inputted a PSTN signal from PSTN and transmits it to the H.323 gate way 21 or is inputted a call signal from the H.323 gate way 21, generates a DTMF signal corresponding to the call signal and transmits it to a terminal connected to the PSTN is comprised. (col. 4, lines 51-61) (emphasis added)

Jeong's H.323 gateway is understood to convert an analog telephone signal (e.g., a PSTN signal) into a signal that complies with a H.323 standard. Thus, Jeong's H.323 gateway is not understood to receive user input requesting IP telephony services, as required by independent claim 1. Additionally, Jeong is not understood to disclose or suggest an application layer that receives DTMF input corresponding to requested IP telephony services, as required by independent claim 12. Accordingly, Applicants respectfully assert that Jeong is not a proper basis for a 35 USC §102(e) rejection, as the reference does not anticipate each and every element of the Applicants' claimed invention of independent claims 1 and 12.

As dependent claim 2 depends upon independent claim 1, Applicants respectfully assert that claim 2 is not anticipated by the cited reference. Further, as dependent claim 16 depends upon independent claim 12, Applicants respectfully assert that claim 16 is also not anticipated by the cited reference.

Regarding Items 5 and 6 of the subject office action, the Examiner rejects claims 3, 4, 7-11, 14, 15, 17 and 18, under 35 USC §103(a), as being unpatentable over Jeong in view of Ress et al. (U.S. Patent No. 6,885,658; hereinafter Ress).

Ress is not understood to remedy the foregoing deficiencies of Jeong. In particular, Ress is not understood to disclose or suggest a stimulus client that receives user input requesting IP telephony services, as required by independent claim 1. Rather Ress describes implementing agents for cross-communicating between IP telephony protocols. In this regard, Ress reads:

> "The present invention provides a novel method and apparatus for interworking between IP telephony protocols. In order to provide this interworking, a call server includes agents that communicate with other entities according to the protocols implemented by the other entities. However, the protocol agents communicate with each other utilizing a protocol-independent agent interworking protocol (AIP). As a result, network entities that implement different protocols can seamlessly communicate with each other." (col. 4, lines 34-42)

Thus, Ress describes a system of cross-communicating between different protocols. As such, the reference is not understood to disclose or suggest a stimulus client that receives user input requesting IP telephony services, as required by independent claim 1. Furthermore, the reference is not understood to describe or suggest an application layer configured to receive DTMF input corresponding to a requested IP telephony service, as required by independent claim 12. Accordingly, Applicants respectfully assert that the combination of the teachings of Jeong and Ress is not a proper basis for a 35 USC §103(a) rejection, as the combination of the teachings of Jeong and Ress fail to disclose each and every element of the Applicants' claimed invention of independent claims 1 and 12.

As dependent claims 3, 4 and 7-11 depend directly or indirectly upon independent claim 1, Applicants respectfully assert that claims 3, 4 and 7-11 are also patentable over the combination of cited references. Further, as dependent claims 14, 15, 17 and 18 depend directly or indirectly upon independent claim 12, Applicants respectfully assert that claims 14, 15, 17 and 18 are also patentable over the combination of cited references.

Regarding Item 7 of the subject office action, the Examiner rejects claims 5, 13, 24, 25 and 29, under 35 USC §103(a), as being unpatentable over Jeong in view of Loghmani et al. (U.S. Patent No. 6,941,273; hereinafter Loghmani).

Loghmani is not understood to remedy the foregoing deficiencies of Jeong. In particular, Loghmani is not understood to disclose or suggest a stimulus client that receives user input requesting IP telephony services, as required by independent claim 1. Furthermore, the reference is not understood to describe or suggest an application layer configured to receive DTMF input

corresponding to a requested IP telephony service, as required by independent claim 12. Still further, Loghmani is not understood to disclose or suggest receiving from a user DTMF input corresponding to a requested IP telephony service, as required by independent claim 24. Rather Loghmani appears to describe a voice-enabled system for online shopping that provides interfaces (e.g., text and graphics) for shopping over the Internet using a browser or a telephone. In this regard, Loghmani reads:

> "In accordance with one aspect of the present invention, a telephony-Internet interface allows telephone callers to access online databases and electronic shopping carts. The telephony-Internet interface converts spoken queries into text for electronic commands transmitted to online shops or shopping carts, and converts requested information from markup language pages to audio messages for callers." (col. 2, lines 53-59)

Thus, Loghmani describes an online shopping system that converts audible queries into text representations. As such the reference is not understood to disclose or suggest a stimulus client that receives user input requesting IP telephony services, as required by independent claim 1. Furthermore, the reference is not understood to disclose or suggest an application layer configured to receive DTMF input corresponding to a requested IP telephony service, as required by independent claim 12. Still further, the reference is not understood to disclose or suggest receiving from a user DTMF input corresponding to a requested IP telephony service, as required by claim 24. Accordingly, Applicants respectfully assert that the combination of the teachings of Jeong and Loghmani is not a proper basis for a 35 USC §103(a) rejection, as the combination of the teachings of Jeong and Loghmani fail to disclose each and every element of the Applicants' claimed invention of independent claims 1, 12 and 24.

As dependent claim 5 depends indirectly upon independent claim 1, Applicants respectfully assert that claim 5 is also patentable over the combination of cited references. Further, as dependent claim 13 depends directly upon independent claim 12, Applicants respectfully assert that claim 13 is also patentable over the combination of cited references. Still

further, as dependent claims 25 and 29 directly depend upon independent claim 24, Applicants respectfully assert that claims 25 and 29 are also patentable over the combination of cited references.

Regarding Item 8 of the subject office action, the Examiner rejects claims 19 and 21-23, under 35 USC §103(a), as being unpatentable over Jeong in view of Hjalmtysson (U.S. Patent No. 6,493,325; hereinafter Hjalmtysson).

Hjalmtysson is not understood to remedy the foregoing deficiencies of Jeong. In particular, Hjalmtysson is not understood to disclose or suggest receiving at an IP telephony client input from a user identifying a telephony service, as required by independent claim 19. Rather Hjalmtysson describes a technique for telephony over networks such as computer networks. In this regard Hjalmtysson reads:

> "The present invention provides a method and an apparatus that facilitate telephony over computer networks. In accordance with an embodiment of the present invention a first party initiating a call identifies to a second party, the called party, the encoding technique which will be utilized in connection with the processing of the call. This identification can take the form of either transmitting the application that will decode the call or the identification can be constituted by an indirect reference to another source of the encoding/decoding application. In this circumstance the calling party does not have to concern itself with whether the called party has the capability of encoding/decoding in accordance with the technique that is used by the first party. No negotiation of signaling standards is required. Instead, the called party can easily adapt to the signaling requirements of the calling party." (col. 1, line 66 to col. 2, line 14).

Thus, Hjalmtysson describes a telephony technique for use with computer networks. As such the reference is not understood to disclose or suggest receiving at an IP telephony client input from a user identifying a telephony service, as required by independent claim 19. Accordingly, Applicants respectfully assert that the combination of the teachings of Jeong and Hjalmtysson is not a proper basis for a 35 USC §103(a) rejection, as the combination of the teachings of Jeong and Hjalmtysson fail to disclose each and every element of the Applicants' claimed invention of independent claim 19.

As dependent claims 21-23 depend directly or indirectly upon independent claim 19, Applicants respectfully assert that claims 21-23 are also patentable over the combination of cited references.

Regarding Item 9 of the subject office action, the Examiner rejects claims 26, 27 and 28, under 35 USC §103(a), as being unpatentable over Jeong in view of Loghmani and in further view of Ress.

As explained above, Applicants respectfully assert that the teachings of Jeong, Loghmani, and/or Ress (individually or in combination) is not a proper basis for a 35 USC §103(a) rejection, as the references fail to disclose each and every element of the Applicants' claimed invention of independent claim 24.

As dependent claims 26, 27 and 28 depend directly upon independent claim 24, Applicants respectfully assert that claims 26, 27 and 28 are also patentable over the combination of cited references.

Regarding Item 10 of the subject office action, the Examiner rejects claim 30, under 35 USC §103(a), as being unpatentable over Jeong in view of Loghmani and in further view of Hjalmtysson.

As explained above, Applicants respectfully assert that the teachings of Jeong, Loghmani, and/or Hjalmtysson (individually or in combination) is not a proper basis for a 35 USC §103(a) rejection, as the references fail to disclose each and every element of the Applicants' claimed invention of independent claim 24.

As dependent claim 30 depends directly upon independent claim 24, Applicants respectfully assert that claim 30 is also patentable over the combination of cited references.

Having dealt with all the objections raised by the Examiner, it is respectfully submitted that the present application, as amended, is in condition for allowance. Thus, early allowance is

earnestly solicited. The Examiner is invited to telephone Applicants' attorney (603-668-6560) to facilitate prosecution of this application.

In the event there are any additional fees due, please charge them to our Deposit Account No. 50-2121.

Respectfully submitted,

HANI ELGEBALY ET AL.

By their Representatives,

**Customer No. 45459**

603-668-6560

Date 4-24-06

By _____
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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 24 day of April, 2006.

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